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January 24, 2007

BY ELECTRONIC FILING AND HAND

The Honorable Sue L. Robinson
United States District Court
844 King Street
Wilmington, DE 19801

Re: Boston Scientific Corp. v. Conor Medsystems; C.A. No. 05-768 (SLR)

Dear Chief Judge Robinson:

During the January 4, 2007 hearing, the Court proposed that BSC identify twelve documents for Conor to produce in unredacted form for *in camera* review. Conor respectfully submits eleven of the twelve documents identified by BSC: 184988-5069 (Exh. B); 184778-815 (Exh. C); 184816-74 (Exh. D); 184875-945 (Exh. E); 185279-92 (Exh. F); 185293-99 (Exh. G); 185302-13 (Exh. H); 185342-55 (Exh. I); 118275-96 (Exh. J); 10282-88 (Exh. K); and 66153-59 (Exh. L). Conor has not submitted Exhibit A because it has obtained permission from St. Jude Medical to produce the redacted information, which was protected by a confidentiality agreement between Conor and St. Jude Medical.

For the Court's convenience, these eleven unredacted documents have been stamped with the same production numbers given to their respective redacted versions. In addition, Conor has indicated in yellow highlighting the information that was redacted. Finally, each document includes a cover page that lists the redacted pages and the type of information that was redacted.

The information redacted in these documents relates to: (1) catheters and drug formulations, which is confidential, competitively sensitive, and irrelevant to this case, *see, e.g.*, 11/27/06 Hearing Tr. at 35-38 (denying BSC's request for discovery on Conor's drug formulations); (2) capital asset information beyond what the Court has ordered Conor to produce, *see, e.g.*, 1/4/07 Hearing Tr. at 59-60 (ordering Conor to produce installation sign-off and capital asset request documents); or (3) confidential business information unrelated to Conor's stents or any issue in this case.

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In addition, Conor will produce certain information that was previously redacted. First, as noted above, Conor has obtained limited and specific permission from St. Jude Medical to produce the specific St. Jude Medical information originally redacted from Exhibit A and the Board of Director's Meetings (Exhs. B-E). Second, in light of its agreement to produce 2006 updates of the kinds of documents relating to Conor's distributors that Conor has already produced for 2005,¹ Conor will also produce previously redacted sales and marketing information related to Biotronik and IVT from the Board of Director's Meetings (Exh. D at CM 184859-65; Exh. E at CM 184919-28).

Respectfully,

/s/ Rodger D. Smith II

Rodger D. Smith II

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cc: Peter T. Dalleo, Clerk (By Electronic Filing; wo/Encl.)
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¹ See January 11, 2007 Letter from Jack Blumenfeld to Judge Robinson (D.I. 67).